

EXHIBIT B

INDEX IN SUPPORT OF MOTION TO SEAL

Material/Title of Document	Basis for Sealing (Legitimate Private or Public Interest Which Warrant the Relief Sought)	Clearly Defined and Serious Injury that Would Result if Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
<p>Redactions on page 2 (“that . . . SaveOnSP”) of the September 5 lead letter (ECF No. 149; the “September 5 Letter”): Discussion of confidential benefits investigations;</p> <p>Exhibits 1-12: Benefits Investigation Updates; and</p> <p>Redactions on Exhibit 13, discovery letter, dated August 22, 2023: page 2 (“reflect . . . plan”).</p>	<p>JJHCS requests the sealing of confidential benefits investigations updates and related discussions in the September 5 Letter and Exhibit 13. These materials contain confidential information that is not known to the general public and for which the parties agreed to keep confidential, including materials designated as Confidential Health Information. JJHCS maintains that Exhibits 1-12 and discussion thereof contain sensitive business and personal health information.</p>	<p>If filed on the public docket, these exhibits and related discussions will reveal confidential material relating to JJHCS’s sensitive business information and confidential health information.</p> <p>Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information and would allow Confidential Health Information to be improperly revealed to the public.</p>	<p>JJHCS requests redactions of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.</p>	<p>None.</p>	<p>None.</p>

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Redactions on Exhibit 16, discovery letter, dated July 24, 2023: page 1 (“many . . .”), (“distributing . . .”), and (“that . . .”), and page 2 (redaction within paragraph on JJHCS_00072942).	JJHCS requests the sealing of an exhibit referencing confidential materials that are not known to the general public and for which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information, including information about documents regarding a non-party, the Lash Group.	If filed on the public docket, this exhibit will reveal confidential material relating to JJHCS’s sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS is submitting a redacted version of this exhibit and requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None.	None.